

Brain Quiros

From: Tisa, Kimberly
Sent: Wednesday, November 9, 2016 8:25 AM
To: Mike Zarba
Cc: Doubleday, Edward; Trombly, Gary; Tisa, Kimberly
Subject: RE: Century Enterprise Center - PCB Contractor Work Plan

Mike:

EPA's comments on the proposed structural steel decon plan follow.

1. The submitted work plan is titled "PCB Remediation Work Plan". Therefore, any reference to other waste, such as the ACM/roofing and proposed disposal should not be referenced herein unless the waste is considered to be PCB waste.
2. There is insufficient data/information to support the proposed decontamination plan as written. The pilot test did not provide specific details on the how the pre/post samples were collected nor were pictures and laboratory data reports provided. For the results reported as "0", the laboratory reporting limit should have been specified in the tables.
3. It is indicated that SDS will collect the wipe sample. Please confirm that SDS personnel are adequately trained in how samples should be collected since the sampling procedure was not provided. If SDS is to collect the sample, a wipe SOP should be prepared for the work.
4. Please provide information on the scrap metal facility. Where is it located and how is the steel recycled?
5. Item 19 does not make sense. It is indicated if a composite wipe test fails that it will be re-washed. What will be re-washed?
6. The verification sampling frequency of 1 wipe per every 20 tons requires additional clarification. It is unclear about the linear footage of structural steel, including number of beams and length, that the 20 tons represents. Thus, EPA can make no determination on the adequacy of the proposed sampling.
7. There was at least one post-wipe sampling result where PCB concentrations went up, but there was no discussion of why this would be.
8. EPA understands that data is pending on the paint samples provided to the previous contractor. EPA also understands that these results are to be provided to the City. As such, please ensure that these results are also provided to EPA. In the event that PCBs are identified in the paint, a change to the decontamination plan may be necessary based on proposed disposal. Please clarify when analytical data is expected on these samples.

Kimberly N. Tisa, PCB Coordinator
USEPA
5 Post Office Square, Suite 100
Boston, MA 02109-3912

617.918.1527 (phone)
617.918.0527 (fax)
Tisa.Kimberly@epa.gov